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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SUSAN L. BUTLER, and PATRICK J. BUTLER,

Plaintiffs,

v. CHADEAYNE, LLC and, ANDREW R. CHADEAYNE.

Defendants.

CASE NO. 2:17-CV-01443-TSZ

PLAINTIFFS' FRCP 26(a)(2) EXPERT DISCLOSURES

PLAINTIFFS' EXPERT DISCLOSURES

COME NOW Plaintiffs Susan L. Butler and Patrick J. Butler ("collectively Plaintiffs"), by and through the undersigned counsel, pursuant to Federal Rule of Civil Procedure 26(a)(2) and this Court's Order of May 4, 2018 (Doc. No. 43), and for their Fed.R.Civ.P. 26(a)(2) Disclosures, state as follows:

- 1. Plaintiffs disclose John S. Kyle, Esq. as a witness that Plaintiffs may use at trial to present evidence under Federal Rules of Evidence 702, 703, or 705. His written report and materials required to be disclosed by Fed. R. Civ. P. 26(a)(2)(B)(i)-(iv) have been provided to Defendants via e-mail.
- 2. Plaintiffs disclose Fernando Torres, MSc. as a witness that Plaintiffs may use at trial to present evidence under Federal Rules of Evidence 702, 703, or 705. His written report and materials required to be disclosed by Fed. R. Civ. P. 26(a)(2)(B)(i)-(iv) have been provided to

Defendants via e-mail. 2 3. Plaintiffs reserve the right to disclose rebuttal witnesses pursuant to Fed. R. Civ. P. 3 26(a)(2)(D)(ii) and this Court's Order of May 4, 2018. 4 Respectfully submitted this 30th day of May, 2018. 5 Respectfully submitted, 6 7 DOWD & DOWD, P.C. 8 BY: /s/ Alex R. Lumaghi 9 DOUGLAS P. DOWD (MO29240) ALEX R. LUMAGHI (MO56569) 10 211 North Broadway, Suite 4050 St. Louis, Missouri 63102 11 (314) 621-2500 Fax (314) 621-2503 12 doug@dowdlaw.net alex@dowdlaw.net 13 Michael B. Tierney, WSBA #13662 14 Tierney& Correa, P.C. 15 719 Second Avenue Ste. 701, Millennium Tower 16 Telephone: 206-232-3074 Facsimile: 206-232-3076 17 Email: tierney@tierneylaw.com Attorneys for Plaintiffs 18 19 20 21 22 23 24 25 26

CERTIFICATE OF SERVICE I certify under penalty of perjury under the laws of the State of Washington, I caused the original of the foregoing document to be filed with the Clerk of the Court via electronic filing, who will send notification of filing to the following: William A. Brasher, WSBA #14005 Boyle Brasher LLC One Metropolitan Square 211 N. Broadway, Ste. 2300 St. Louis, Missouri 63102 P: (314) 621-7700 F: (314) 621-1088 wbrasher@boylebrasher.com Attorneys for Defendants /s/ Alex. R. Lumaghi